

Dear Hon. Magistrate James B. Clark: 03-12-18

How are you doing? I pray that all is well. On tonight Mr. McAndrew Esq. sent me a letter. He stated as-per Rule 31(B) I was suppose to let him know, ~~if~~ if I was using my own Court Reporter. He was on the phone when you said I could do 50 <sup>written</sup> questions. This is another stall tactic and I don't know what to do. You gave us a drop dead 03-31-18 dead line on discovery. Also, Mr. Seaman has not even turned over deposition answers for Warden Bigott, and Captain Pawson. It is already 03-12-18 what do I do. I'm going to file ethics charges on how they are bullying me as a Pro Se litigant. Please advised me the direction of the Court on these stall tactics, discovery withholdings, and my recourse. Thank you so much.

CC:

Leonard  
Seaman Esq.  
Martin  
McAndrew  
Esq.

Docket#  
14-03564

Sincerely yours,  
Chia M. [Signature]

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Ivan G. Mc Kinney #601321  
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ocket #  
14-03564

03-12-18

Dear Mr Andrew:

On tonight I recieved a letter from you. You stated "as per Fed Rule 31(B) the party who noticed the Deposition must state the name or descriptive title and address of the officer [Court Reporter] before whom the deposition is being taken". You also stated I did not provide this information, and you did not know if I was using an outside Court Reporter. You clearly heard Judge Clark tell me I had to do 50 written questions. This is ~~not~~ another stall tactic. You know Hon. Judge Clark gave us a drop dead date. I'm really shocked you and Mr. Seaman continue to manufacture these delays. I am deposing by written questions any way!

Sincerely yours,  
Ivan Mc

PS:

I talk  
to you on  
the phone  
02-23-18  
and you  
could have  
asked me.

stall  
tactic!!  
!!!!

cc:

Hon.  
Judge  
James B.  
Clark

Leonard  
Seaman ESQ.

Ivan G. McKinney #601321  
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John 3:16  
Legal - Mail

**RECEIVED**

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Judge James B. Clark  
50 Walnut Street  
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03/13/2018

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